

REMARKS/ARGUMENTS

Reconsideration and allowance are respectfully requested. Claim 11 has been amended hereby. Claims 11-15 are pending for examination in this application.

The informalities objected to by the Examiner have been addressed by Applicant's present amendments to claim 11. Applicant respectfully requests that the objections be withdrawn.

Claims 11-15 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Nathan et al. (WO 96/12258) in view of Goldstein (U.S. Pat. 5,410,326) and Cohen (U.S. Pat. 6,198,408). (Applicant notes that while the preceding list of prior art lists Cohen as a secondary reference, the substance of the rejection appears to be based on Sakazume et al. (U.S. Pat. 6,538,558) as opposed to Cohen. Applicant's response is made based on the assumption that Sakazume was the reference applied by Examiner).

Applicant respectfully submits that the applied references do not teach or suggest all elements of the combination claimed in independent claim 11. For example, claim 11 recites, *inter alia*, "a specific key that, when actuated, triggers a signal comprising a remote control identification code without an associated key code which facilitates the storing of this remote control identification code as a saved remote control identification code by the jukebox..."

The Office Action concedes that Nathan does not teach this claim element, and introduces Sakazume to compensate for the deficiency of Nathan. Sakazume, however,

does not teach “a specific key that, when actuated, triggers a signal comprising a remote control identification code without an associated key code.”

Sakazume does discuss using a device provided with a transmitter to program a receiver, but that is taught to be done through use of one of the command keys. (see col. 9, lines 26-45). Sakazume does not teach or suggest a specific key to be used for the transmission of the control signal.

For at least this reason, Applicant submits that independent claim 11 is patentable over the applied references. Claims 12-15 should be allowable based on their dependency from allowable claim 11.

Additionally, Applicant submits that it would not have been obvious to combine the three references to non-analogous art, absent the impermissible use of Applicant's own disclosure as a guide.

Sakazume is expressly directed at a system for use with “a single receiver disposed inside a mobile body such as a car.” (Col. 1, lines 8-10). Goldstein, on the other hand, is directed at a universal remote control. Finally, Nathan is directed at an audiovisual reproduction system.

One of skill in the art would not have been motivated to take features from a keyless car entry system, combine them with features from a centrally updateable cable box/remote, and add that combination to a jukebox system. Only Applicant's disclosure would motivate such a combination in hindsight.

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For at least this additional reason, Applicant submits that claims 11-15 are allowable over the applied references.

In view of the foregoing, independent claim 11 and claims 12-15 dependent therefrom are believed to be in condition for allowance and action to that end is earnestly and respectfully solicited.

Respectfully submitted,

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